

**Federal Defenders
OF NEW YORK, INC.**

Southern District
52 Duane Street-10th Floor, New York, NY 10007
Tel: (212) 417-8700 Fax: (212) 571-0392

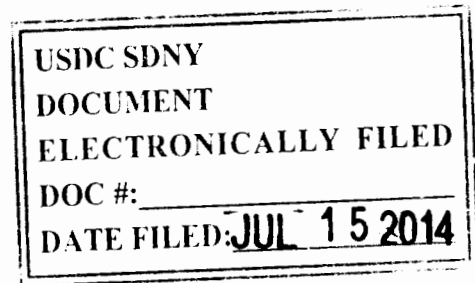
David E. Patton
Executive Director
and Attorney-in-Chief

Southern District of New York
Jennifer L. Brown
Attorney-in-Charge

July 15, 2014

BY EMAIL

Honorable Katherine B. Forrest
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007



**Re: United States v. Joseph L. Junkovic
S1 13 Cr. 682 (KBF)**

Dear Judge Forrest:

I have been appointed to represent Joseph Junkovic in the above-captioned case. I write to request an adjournment of Mr. Junkovic's sentencing and the deadline for submission of defendant's sentencing letter. Sentencing is scheduled for July 30, 2014. Mr. Junkovic pled guilty on April 24, 2014. On July 14, 2014, the parties received the initial presentence investigation report. I have reviewed the report and I have a number of potential factual objections. I would like an opportunity to confer with the government regarding these issues, to see if the parties can reach any agreement, and to submit a letter and any necessary remaining objections to the Probation Department. In order to have time to do this, I am asking that sentencing be adjourned (as counsel requested in a July 10, 2014 letter, before the parties had received the initial presentence report). Sentencing in this matter has not previously been adjourned. I have conferred with AUSA Andrew Goldstein, who consents in this adjournment request on behalf of the government. Thank you for consideration of this request.

Ordered
Sentencing adjourned to
9/15/14 at 1 pm,
1- P. J. [Signature]
USDC

Sincerely,
/s/ Sarah Baumgartel
Sarah Baumgartel, Esq.
Assistant Federal Defender
Tel: (212) 417-8772
Sarah_Baumgartel@fd.org

cc: AUSA Andrew Goldstein, Esq. (by email)

7/15/14